LOCAL CIVIL RULE 16.1(f)7 (Civil Actions - Scheduling)

7. State whether any party anticipates requesting a protective order. In the meeting required by Rule 26(f), Federal Rules of Civil Procedure, the parties shall discuss specific areas of written discovery and deposition testimony which may be the subject of a request for protective order. Any party which anticipates requesting a protective order shall serve on every other party a proposed protective order and a proposed stipulation for its entry no later than the date of serving initial disclosures required in Rule 26(a)(1), Federal Rules of Civil Procedure. Any party seeking a protective order without first having followed the requirements of this Local Rule shall state the cause within any motion for protective order later filed with the Court.